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February 25, 2000

VIA HAND DELIVERY

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, SW
TW-A325
Washington, D.C. 20554

Re: Written *Ex Parte* Response to Coalition for Affordable
Local and Long Distance Service Proposal, CC
Docket Nos. 94-1, 96-262.

Dear Ms Salas:

On behalf of the Ad Hoc Telecommunications Users Committee ("Ad Hoc") enclosed herewith is a written *ex parte* in the above-referenced docket. This *ex parte* clearly demonstrates that the benefits of the Federal Communications Commission's ("FCC") Access Charge Reform policy, introduced in 1984, are substantial and extensive. On average, the rates for both interstate and international long distance calls have decreased over 50% while the demand for such services has quadrupled. Competition is increasing for both facilities-based carriers and resellers. Most importantly, the benefits generated by the Access Charge Reform policy are all encompassing; large corporate users along with small business and residential customers have profited from the lowered rates yielded by Access Charge Reform. As this *ex parte* illustrates, the success of Access Charge Reform is expected to continue.

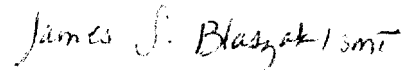
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Ms. Salas
February 25, 2000
Page 2

In accordance with Section 1.1206(b)(2) of the Commission's Rules, 47 C.F.R. § 1.1206(b)(1) and (2), two copies of this letter along with its attachments are included herein regarding the above-captioned proceeding.

Respectfully submitted,

A handwritten signature in cursive script that reads "James S. Blaszak".

James S. Blaszak

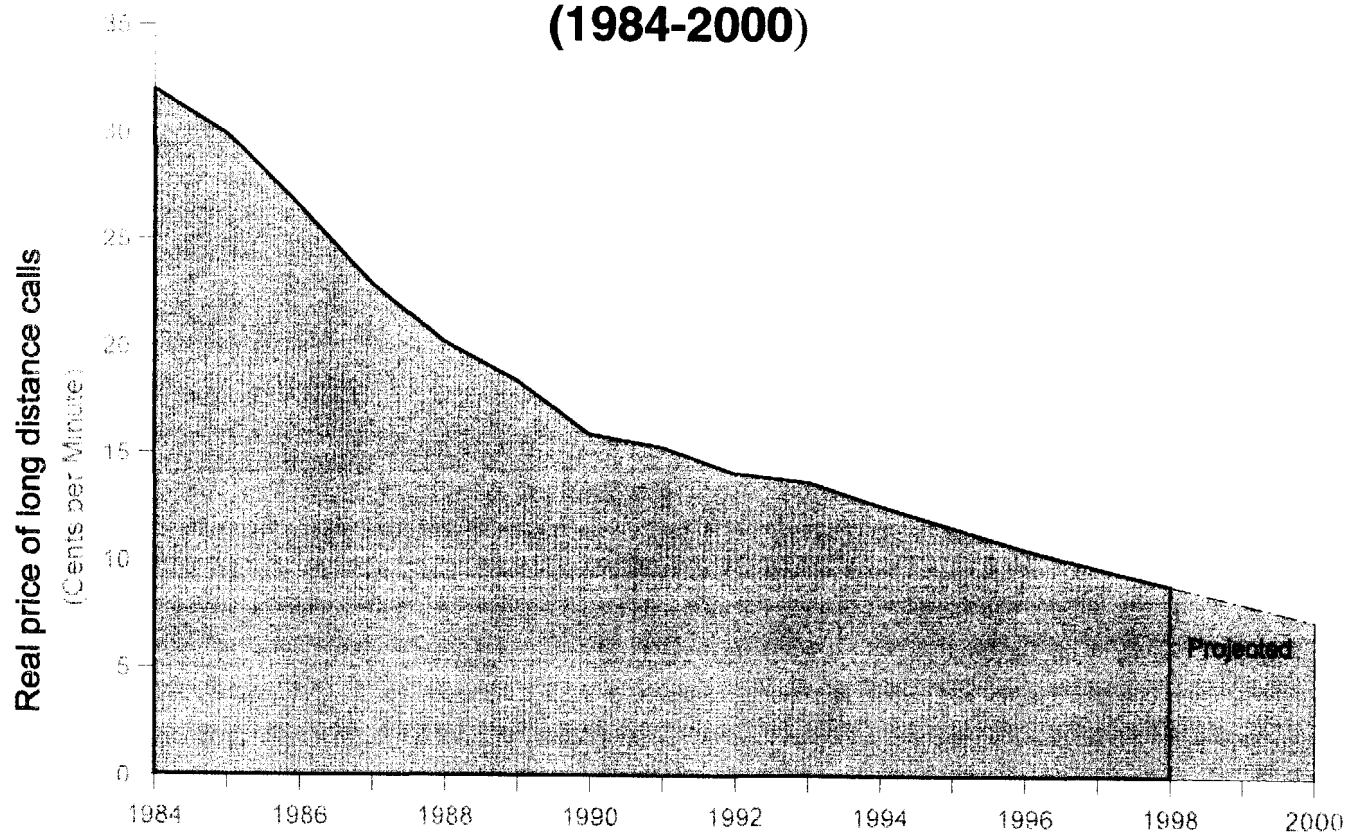
Counsel for
Ad Hoc Telecommunications
Users Committee

Enclosures

cc: Chairman Kennard (w/ enclosures)
Commissioner Ness (w/ enclosures)
Commissioner Furchtgott-Roth (w/ enclosures)
Commissioner Powell (w/ enclosures)
Commissioner Tristanit (w/ enclosures)
Lawrence Strickling (w/ enclosures)
Jane Jackson (w/ enclosures)
Richard Lerner (w/ enclosures)

THE FCC'S ACCESS CHARGE POLICIES

A Report Card on the Benefits for Residential Consumers (1984-2000)



AD HOC TELECOMMUNICATIONS USERS COMMITTEE
February 2000

THE FCC'S ACCESS CHARGE POLICIES

**A Report Card on the Benefits
for Residential Consumers**

1984-2000

AD HOC TELECOMMUNICATIONS USERS COMMITTEE

February 2000

As this report demonstrates, the FCC's access charge policies have been a resounding success. All telecommunications consumers, from the largest corporate users to small business and individual residential customers, have realized substantial and permanent benefits.

- Beginning in 1984, the FCC embarked upon a plan designed to better align the price of interstate long distance telephone service with its underlying economic costs, and to create a market environment that would better accommodate and encourage the development of competition.**
- Specifically, the Commission directed that costs that do not vary with the volume of use of long distance service (so-called "Non-Traffic-Sensitive" costs) be recovered through fixed "end user" charges applied to residential and business subscriber line monthly bills, and that only "Traffic-Sensitive" costs be recovered through usage-based "access charges."**

The result: Substantially lower long distance rates, robust competition for long distance services, and no net increase in the real price of local telephone service.

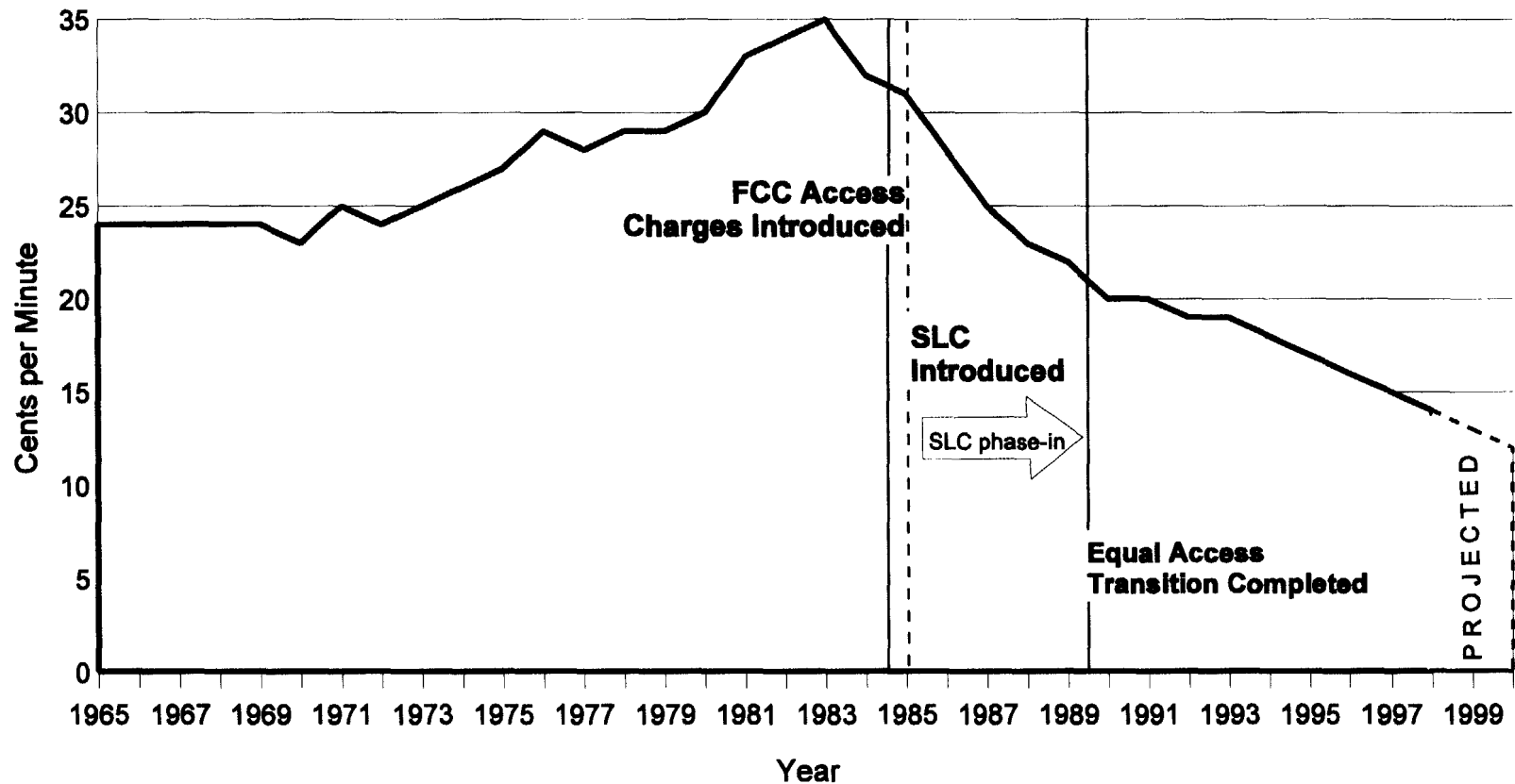
Since the initiation of the FCC's Access Charge policy in 1984:

- **The average rate per minute for interstate/international long distance calls has decreased by more than 60%.**
- **Usage of these services has more than quadrupled.**
- **Prices available to individual consumers have closely tracked the rate decreases that the nation's largest corporate telecom users have been able to achieve for comparable service through negotiation of custom network service package deals with carriers.**
- **Hundreds of firms — including both facilities-based carriers and resellers — have entered the long distance market.**
- **Local rate increases, including the FCC's end user charges, have been modest, and in real terms are still below their 1984 levels.**
- **Residential consumers have not, as many had predicted, dropped off the network, and in fact the demand for local residential telephone service has actually increased.**

Through the combined effects of lower switched access charges, significantly increased competition, and major technological advances driven in large part by competitive marketplace forces, the average price per minute for interstate/international long distance calling has dropped by more than 60% since 1984.

- Prices for direct-dialed calls have seen even larger decreases.**
- International rates to some countries are now as low as domestic long distance prices.**
- A multitude of new pricing plans have been introduced, with marginal usage rates as low as five cents a minute, or even less.**

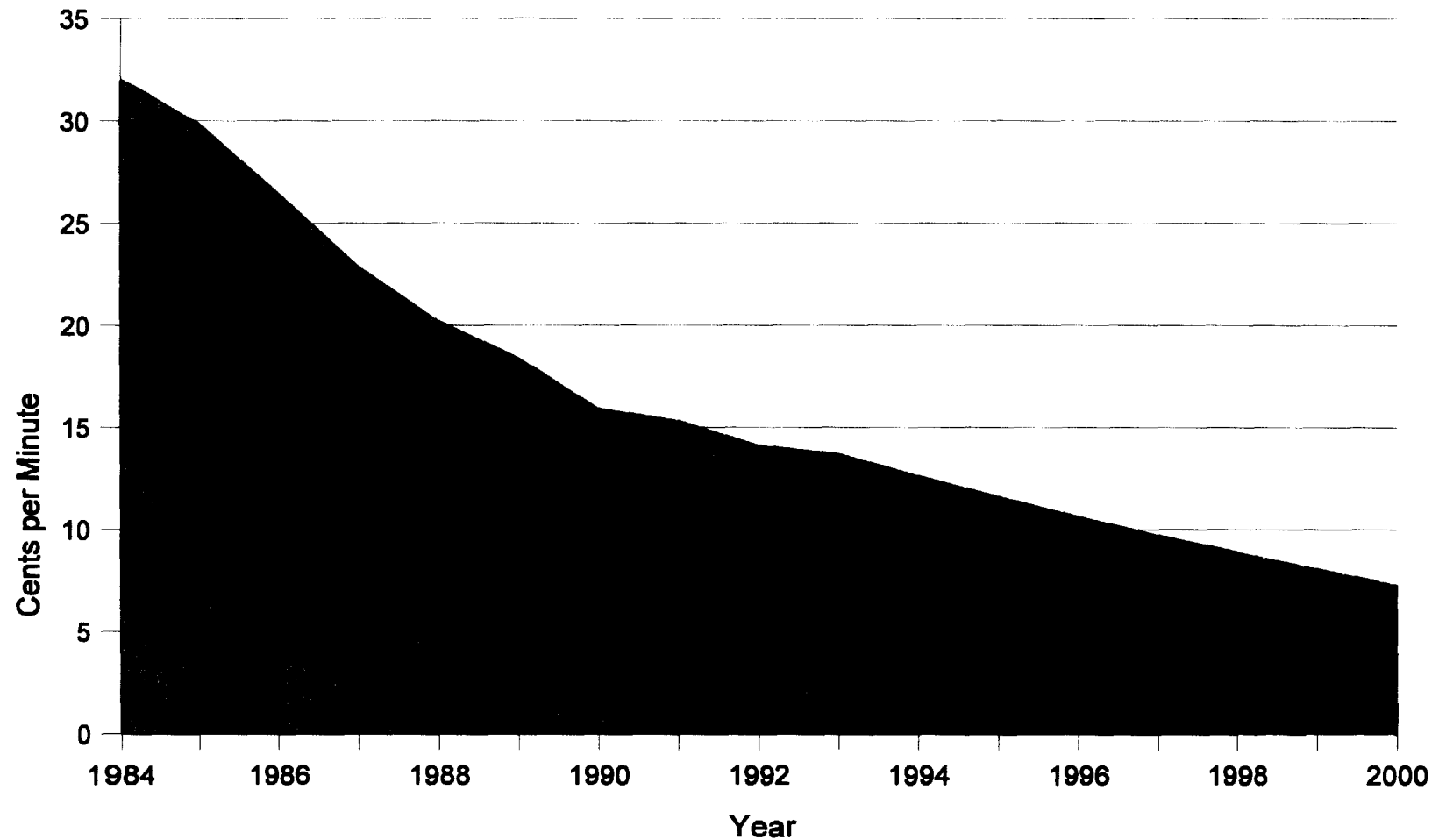
Long distance rates have dropped sharply since the institution of FCC Access Charge Policy



Source: FCC Report, Trends in Telephone Service, September 1999, Table 14.6- Average Revenue per Minute.

Note: Source includes all interstate and international direct dialed and operator assisted calls averaged across all rate periods.

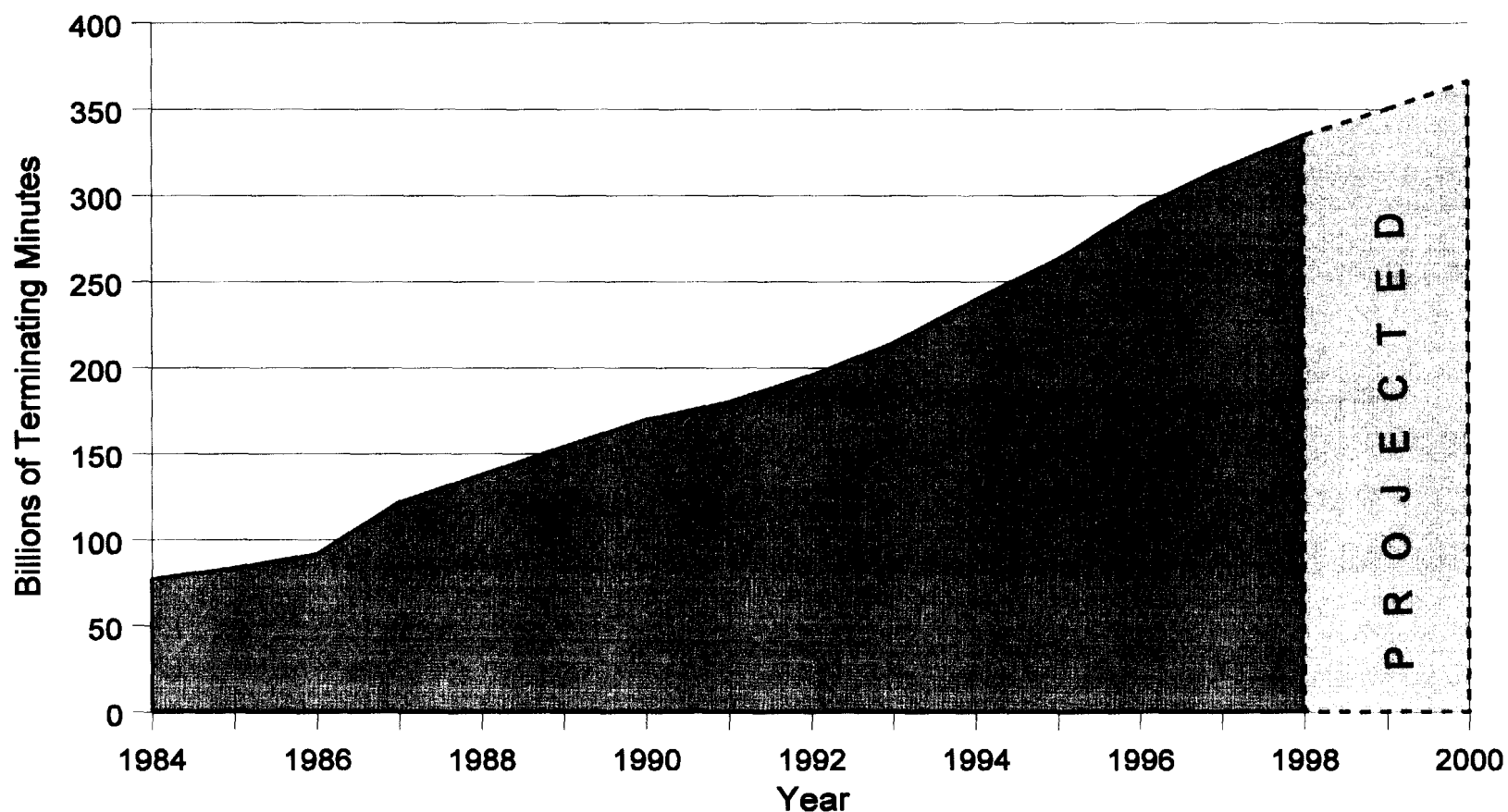
The real price of interstate/international long distance calling has dropped by 77% since 1984.



Source: FCC Report, Trends in Telephone Service, September 1999, Table 14.6 - Average Revenue per Minute.

Note: Source includes all interstate and international direct dialed and operator assisted calls averaged across all rate periods.

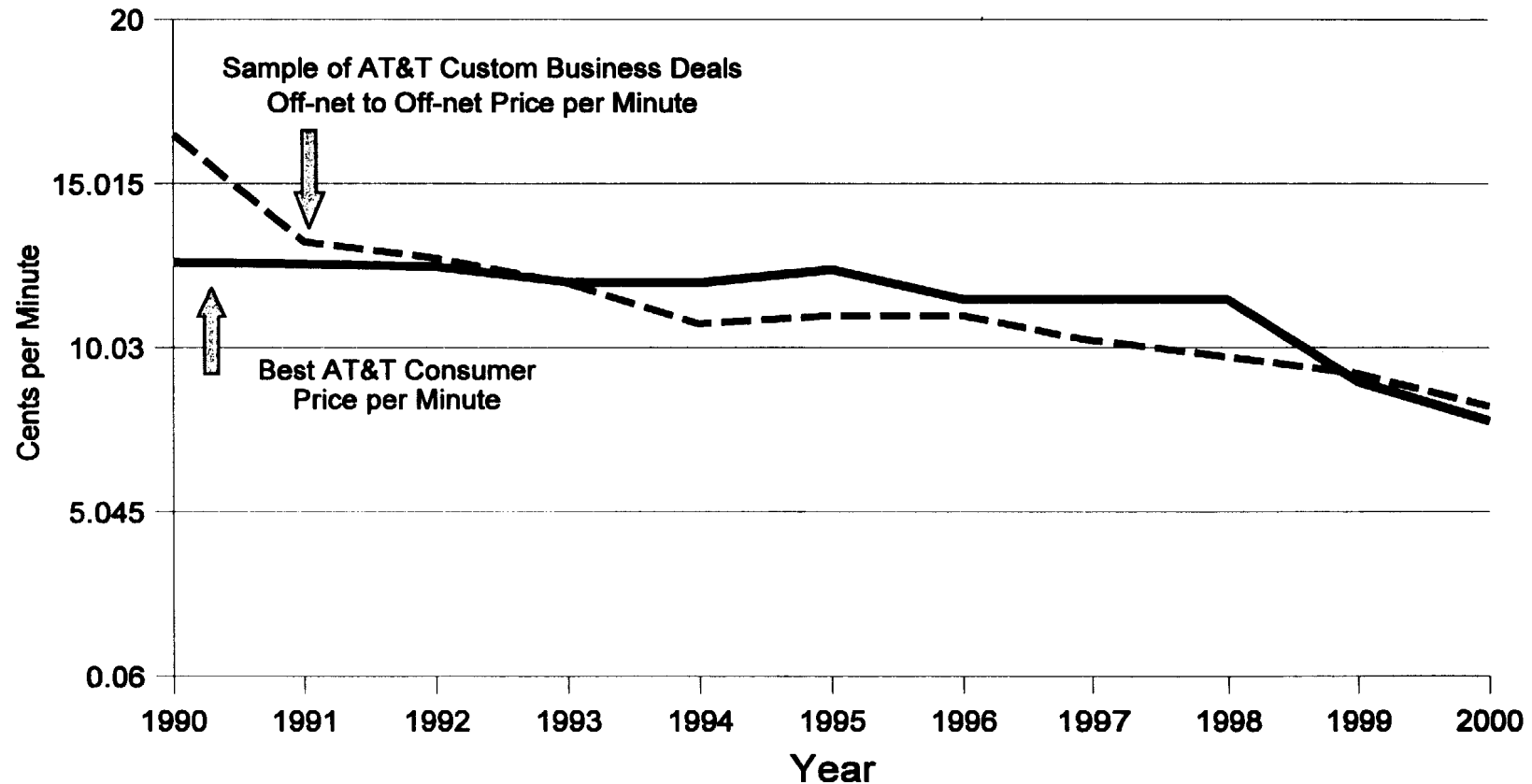
Consumers have responded to the lower long distance prices by quadrupling their demand between 1984 and 1998.



Source: FCC Report, Trends in Telephone Service, September 1999, Table 11.1 - Interstate Switched Access Minutes.
Note: 1984 terminating minutes are approximated by multiplying the sum of 3rd and 4th quarter results by two. The terminating minutes shown for 1984, 1985, and 1986 are the total industry access minutes divided by two.

As a direct result of the robust competition that has developed at the *retail* end of the long distance market, individual consumers who spend as little as \$50 per month on long distance service have enjoyed virtually the same rate of price drops as those that have been negotiated by the largest corporate telecom users.

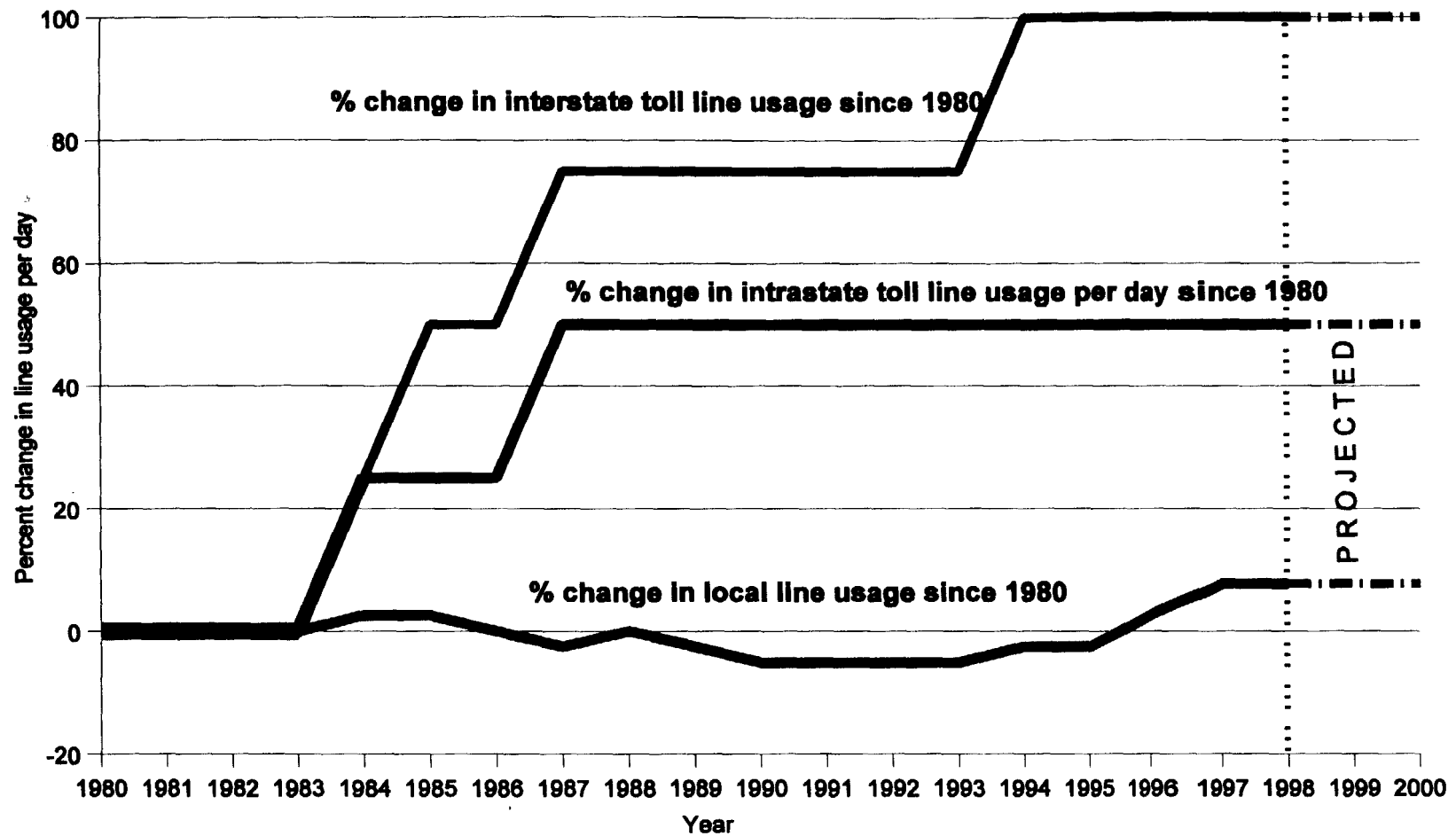
Residential consumers who spend as little as \$50 a month on long distance pay roughly the same price per minute as the largest business customers who commit to a multi-year \$10-million annual contract.



Note: Residential prices based upon the best AT&T rates available in January of each year. These rates were weighted for the time of day based on heavy evening usage and include monthly "plan" charges. Business prices were developed from a sample of outbound off-net to off-net Tariff 12 rates available during each year shown.

That the growth in interstate/international usage volumes is directly attributable to the plunging prices of these services is demonstrated by the fact that use of local and intrastate toll services, which have not experienced anything close to the same overall price level decreases as interstate/international, have grown far less, on a per-access line basis, than the demand increase experienced by interstate/international long distance calling.

Daily usage per Access Line



Source: FCC Report, Trends in Telephone Service, September 1999, Table 12.2 - Line Usage Per Day Dial Equipment Minutes Per Local Loop

Not only have consumer long distance prices plummeted, but distance has been eliminated as a factor in the price of all domestic long distance calls.

- **In 1980, 70 cents would buy a 5-minute evening rate period call of no more than 22 miles.**
- **By 1990, the same 70 cents would buy a 5-minute evening rate 124-mile call.**
- **But today, for 70 cents, consumers can place a 10-minute call, any time of the day, to anywhere in the country!**

How far could you go for 70 cents?



1980 - 5 Minute Call
22 miles



1990 - 5 Minute Call
124 miles

2000 - 10 Minute Call
Entire United States

Source: NARUC, Long Distance Message Toll Telephone Rates, June 30, 1981; AT&T Communications, Tariff FCC No. 1, Section 3.2.1.L1, Effective: July 1, 1990; The 2000 rate is based on Consumer Reports, February 2000 issue that shows a 6.9 cents per minute rate as the most competitive long distance plan that has no monthly fee.

Long distance prices have dropped to the point where the *entire United States* is now essentially a "local" call.

- **The real price of a 5-minute local call in New York City as it existed in 1970 would be approximately 25 cents in today's dollars.**

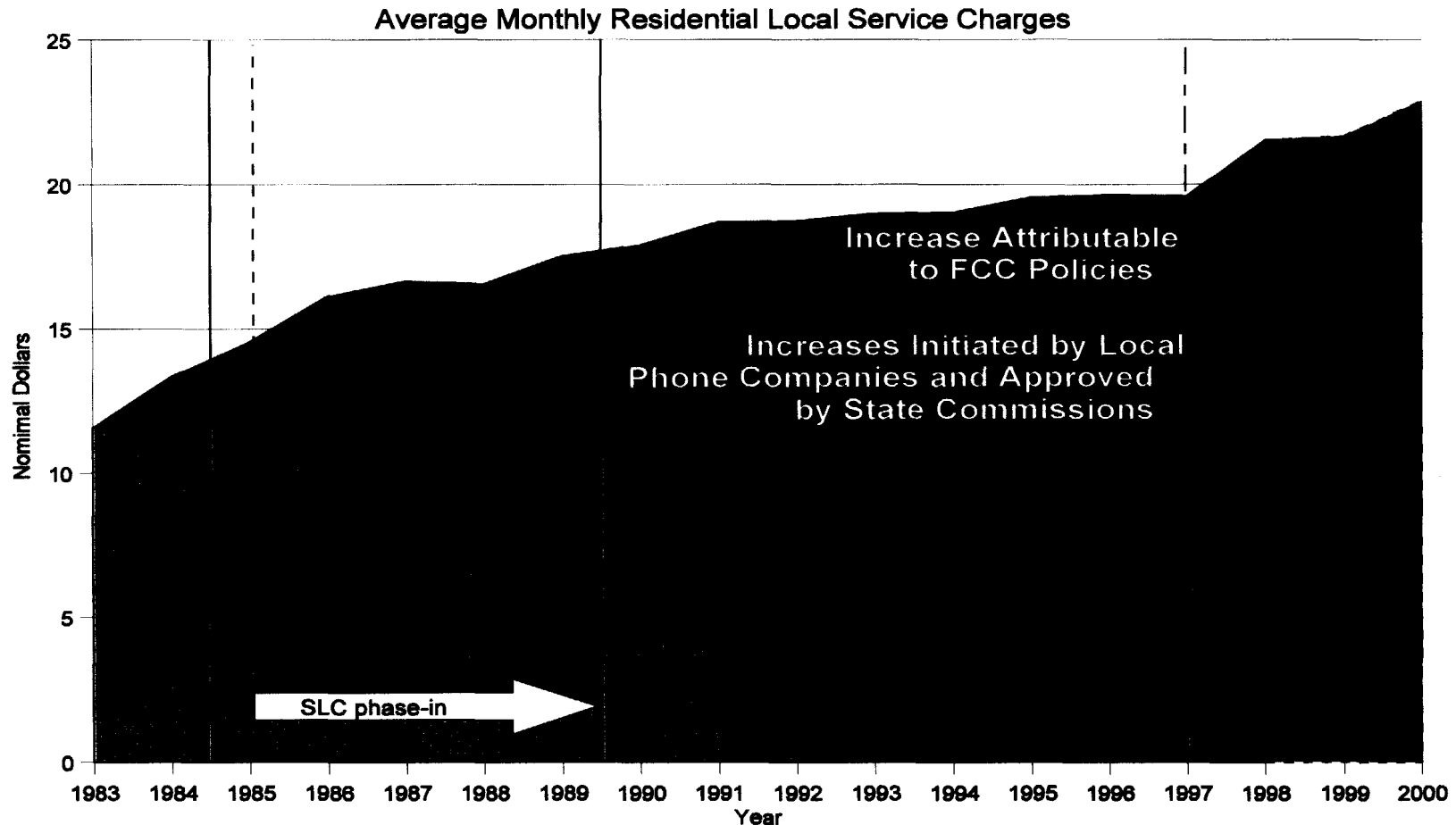
In 1970, the price of a 5-minute local call in New York City was 5.7 cents; in real dollars, that is equivalent to about 25 cents today.

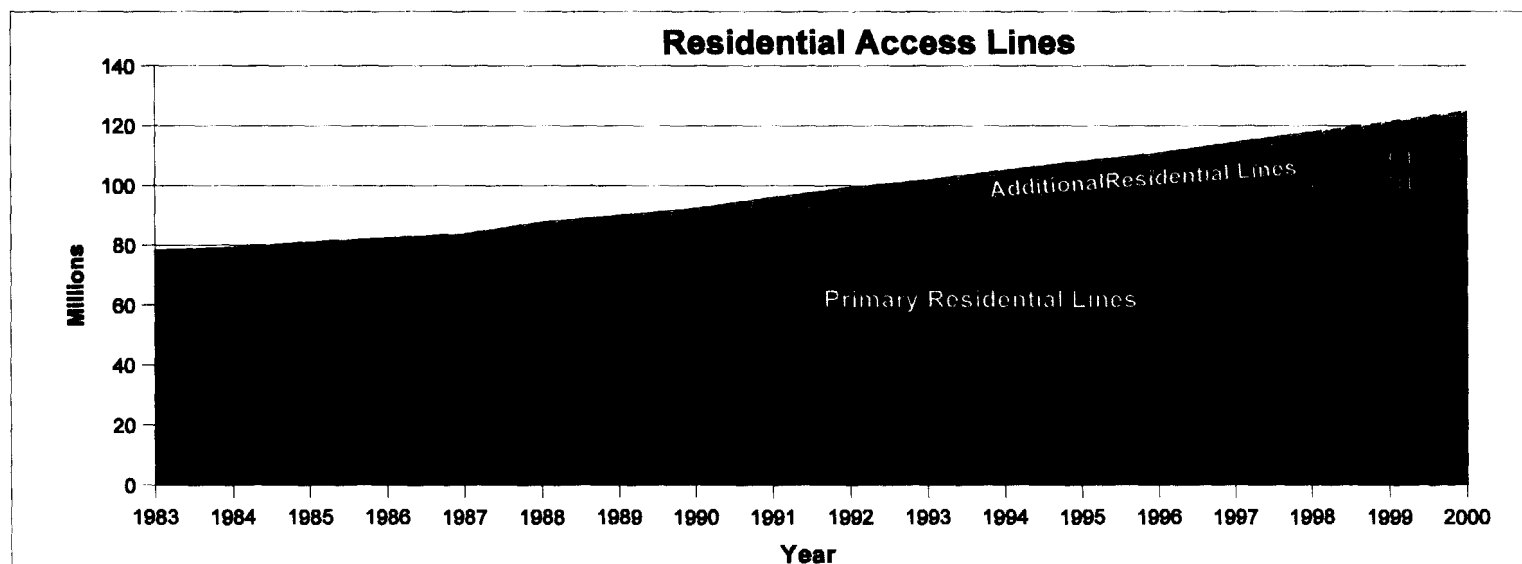
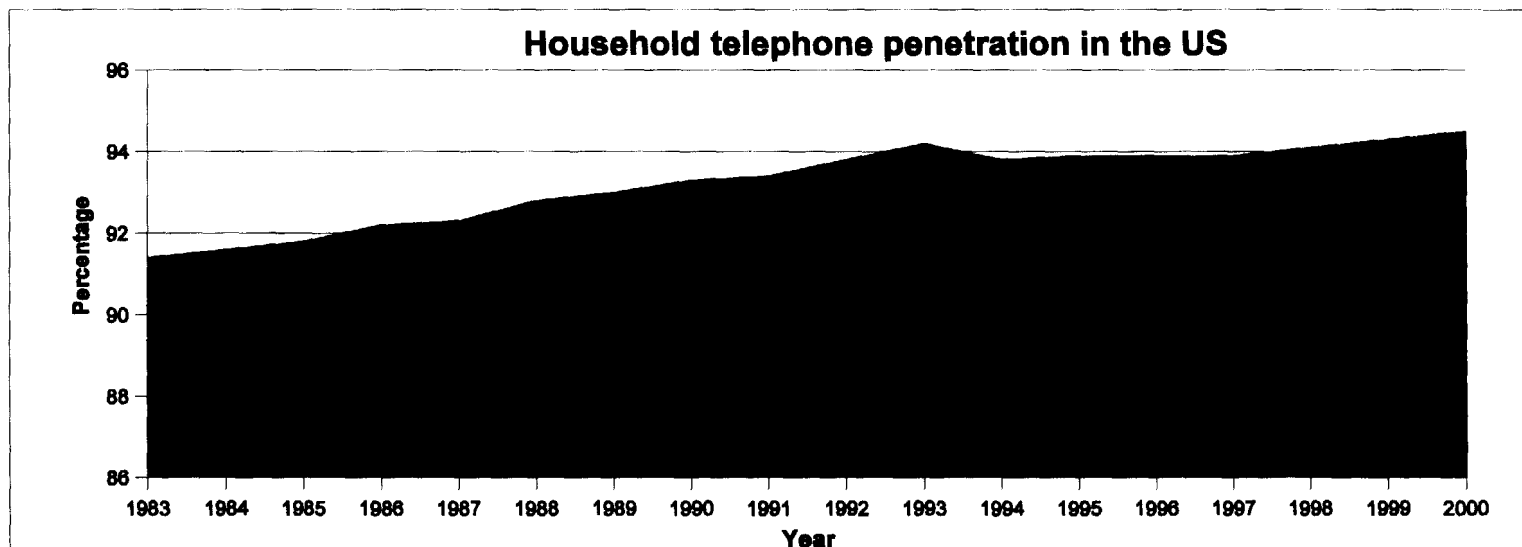
- **Using the best available night/evening rate, that same 25 cents today will buy a 5-minute call to anywhere in the country.**

The introduction of "Subscriber Line Charges" has not made basic residential service unaffordable. Precisely the opposite has occurred.

- FCC access charge policies are responsible for only a portion of the overall rise in the nominal price of basic residential service. Local rate increases initiated by the incumbent LEC and approved by state PUCs account for a significant portion of the total increase in local phone rates.**
- Demand for residential access lines actually increased over the period. Household penetration is up and, due in part to the Internet, there has been a significant jump in the demand for additional residential access lines in just the past several years.**
- Notwithstanding the increase in the *nominal* (current dollar) price of local residential telephone service, the *real* price has not increased, and is still lower today than it was in 1984.**

Despite the rise in local service prices - only a portion of which is attributable to FCC access charge policies - there has been no fall-off in demand for local service.



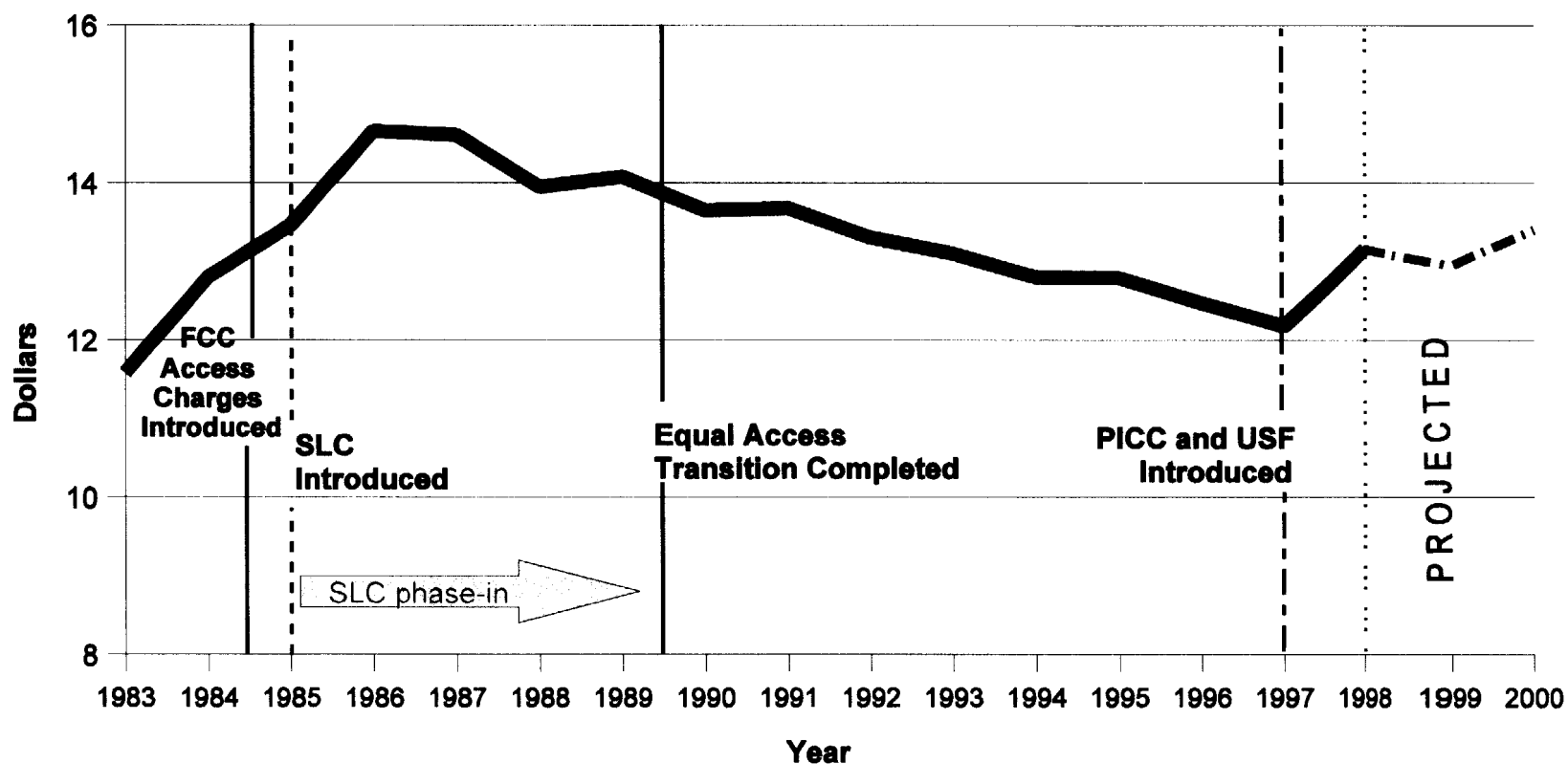


Source: FCC Report, Trends in Telephone Service, September 1999, Table 14.5 - Household Telephone Subscribership in the United States, Table 20.4 - Additional Residential Lines for Households with Telephone Service.

Even with SLC and PICC charges and various local rate increases adopted at the state level, the real price of local phone service has remained roughly the same since 1984.

When effective competition finally becomes a reality at the local level, it is reasonable to expect the same sort of *real* price decreases for local phone service as the nation has enjoyed for nearly two decades in the highly competitive long distance market.

Expressed in real (constant dollar) terms, the price of local residential service remains near its 1983 level.



Source: FCC Report, Trends in Telephone Service, September 1999, Table 14.1 - Average Residential Rates for Local Service in Urban Areas; FCC Report, Trends in Telephone Service, September 1992, Table 6- National Averages for Local Telephone Rates.

DATA APPENDIX

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Table 2			
Interstate/International Average Revenue per Minute in 1984 Constant Dollars			
Year	Cents per Minute	CPI BASE YEAR 1982-84	Real Price Cents per Minute
1984	32	103.9	32.0
1985	31	107.6	29.9
1986	28	109.6	26.5
1987	25	113.6	22.9
1988	23	118.3	20.2
1989	22	124.0	18.4
1990	20	130.7	15.9
1991	20	136.2	15.3
1992	19	140.3	14.1
1993	19	144.5	13.7
1994	18	148.2	12.6
1995	17	152.4	11.6
1996	16	156.9	10.6
1997	15	160.5	9.7
1998	14	163.0	8.9
1999 <i>projected</i>	13	166.6	8.1
2000 <i>projected</i>	12	170.1	7.3
Sources:	FCC Report, <i>Trends in Telephone Service</i> , September 1999, Table 14.6 - Average Revenue Per Minute. The values for average revenue per minute include direct-dialed and operator-assisted interstate and international usage.	Bureau of Labor Statistics Data, Consumer Price Index - All Urban Consumers, Not Seasonally Adjusted, Base Period 1982-84=100.	Calculated by multiplying the nominal year price by the CPI for the base year over the CPI for the corresponding year.

Table 1		
Interstate/International Average Revenue per Minute 1965 - 2000		
Year	Cents per Minute	
1965	24	
1966	24	
1967	24	
1968	24	
1969	24	
1970	23	
1971	25	
1972	24	
1973	25	
1974	26	
1975	27	
1976	29	
1977	28	
1978	29	
1979	29	
1980	30	
1981	33	
1982	34	
1983	35	
1984	32	
1985	31	
1986	28	
1987	25	
1988	23	
1989	22	
1990	20	
1991	20	
1992	19	
1993	19	
1994	18	
1995	17	
1996	16	
1997	15	
1998	14	
1999 projected	13	
2000 projected	12	

Source: FCC Report, *Trends in Telephone Service*, September 1999, Table 14.6 - Average Revenue Per Minute. The values for average revenue per minute include direct-dialed and operator-assisted interstate and international usage.

Projections based on linear extrapolation.

Table 3		
Aggregate Demand for Long Distance Service		
1984 - 2000		
Year	Interstate Terminating Access Minutes	Source
1984	77.1	Terminating minutes approximated by annualizing 3rd and 4th quarter access minutes, and dividing by 2.
1985	83.55	Terminating minutes approximated by dividing total access minutes by 2.
1986	91.55	
1987	121.8	Source: FCC Report <i>Trends in Telephone Service</i> , September 1999, Table 11. 1 - Interstate Switched Access Minutes, column Total Industry Terminating Minutes.
1988	137.8	
1989	153.9	
1990	169.6	
1991	179.8	
1992	195.4	
1993	214.1	
1994	239.4	
1995	262.7	
1996	292.8	
1997	315.4	
1998	334.8	
1999 <i>projected</i>	350.2	Projections based on linear extrapolation.
2000 <i>projected</i>	366.3	

Table 4A

Best AT&T Residential Price Per-Minute Rate Based on \$50 Monthly Long Distance Expenditure

Year	Plan	Monthly Recurring Charge	Marginal Rate per Minute	Monthly Minutes of Use for \$50	Average Rate per Minute	Sources:
1990	Reach Out America	\$8.70 for the First Hour of Night/Weekend Calling	\$ 0.1210	396	\$ 0.1263	AT&T REACH OUT-America Plan, AT&T Tariff FCC #1, 25th revised p. 55, 16th revised p. 55.1, 7th revised p. 55.1.1, Original p. 55.1.2, 33rd revised p. 55.2, 31st revised p. 56.
1991	Reach Out America	\$8.70 for the First Hour of Night/Weekend Calling	\$ 0.1205	398	\$ 0.1258	AT&T REACH OUT-America Plan, AT&T Tariff FCC #1, 26th revised p. 55, 17th revised p. 55.1, 7th revised p. 55.1.1, Original p. 55.1.2, 34rd revised p. 55.2, 38th revised p. 56.
1992	Reach Out America	\$8.70 for the First Hour of Night/Weekend Calling	\$ 0.1197	400	\$ 0.1250	AT&T REACH OUT-America Plan, AT&T Tariff FCC #1, 27th revised p. 55, 19th revised p. 55.1, 10th revised p. 55.1.1, 1st revised p. 55.1.2, 34rd revised p. 55.2, 40th revised p. 56.
1993	Reach Out America	\$8.70 for the First Hour of Night/Weekend Calling	\$ 0.1138	416	\$ 0.1203	AT&T REACH OUT-America Plan, AT&T Tariff FCC #1, 30th revised p. 55, 20th revised p. 55.1, 11th revised p. 55.1.1, 1st revised p. 55.1.2, 39th revised p. 55.2, 47th revised p. 56, 3rd revised p. 55.4.2, 2nd revised p. 55.4.3, 2nd revised p. 55.4.4.
1994	Reach Out America	\$8.70 for the First Hour of Night/Weekend Calling	\$ 0.1126	416	\$ 0.1201	AT&T REACH OUT-America Plan, AT&T Tariff FCC #1, 32nd revised p. 55, 24th revised p. 55.1, 14th revised p. 55.1.1, 5th revised p. 55.1.1.1, 2nd revised p. 55.1.2, 43rd revised p. 55.2, 66th revised p. 56.
1995	Reach Out America	\$9.50 for the First Hour of Night/Weekend Calling	\$ 0.1169	403	\$ 0.1241	AT&T REACH OUT-America Plan, AT&T Tariff FCC #1, 35th revised p. 55, 25th revised p. 55.1, 15th revised p. 55.1.1, 6th revised p. 55.1.1.1, 3rd revised p. 55.1.2, 45th revised p. 55.2, 77th revised p. 56.
1996	Simplified Calling Plan No. 2	\$0.00	\$ 0.1150	435	\$ 0.1150	AT&T Simplified Calling Plan Promotion No. 2, AT&T Tariff FCC #27, Original p. 21-137.39.
1997	Simplified Calling Plan No. 2	\$0.00	\$ 0.1150	435	\$ 0.1150	AT&T Simplified Calling Plan Promotion No. 2, AT&T Tariff FCC #27, 3rd revised p. 21-137.18.
1998	Simplified Calling Plan No. 2	\$0.00	\$ 0.1150	435	\$ 0.1150	AT&T Simplified Calling Plan Promotion No. 2, AT&T Tariff FCC #27, 5th revised p. 21-137.18.
1999	Electronic Billing Calling Plan	\$0.00	\$ 0.0900	556	\$ 0.090	AT&T Electronic Billing Calling Plan, AT&T Tariff FCC #27, Original p. 4-66, Original p. 24-57.38.
2000	Seven Sense Plan	\$4.95	\$ 0.0700	644	\$ 0.078	AT&T Seven Sense Plan, AT&T Tariff FCC #27, Original p. 4-74.

Note: All Reach Out - America plans and the Simplified Calling Plan No. 2 have different rates depending on the time of day. In order to calculate the rate per minute for these plans, we assumed heavy evening usage with 70% of the calls being made in the evening, 20% of calls being made in the night/weekend, and 10% of the calls being made in the day.

Table 4B		
Average Per-Minute Off-net to Off-net Rate in AT&T Tariff 12 VTNS Options with Annual Commitments in Excess of \$10-Million		
Year	Average Rate per Minute	Source
1990	\$ 0.1650	Tariff 12 Options: 13, 20, 22, 25, 32, 34
1991	\$ 0.1325	Tariff 12 Options: 20, 32, 38, 43, 50, 55, 65, 67, 69, 71
1992	\$ 0.1275	Tariff 12 Options: 19, 28, 38, 43, 49, 88, 96, 104, 105, 107
1993	\$ 0.1200	Tariff 12 Options: 5, 24, 43, 53, 57, 72, 114
1994	\$ 0.1075	Tariff 12 Options: 4, 7, 13, 24, 27, 40, 68, 71, 75, 94, 101, 114, 133, 142
1995	\$ 0.1100	Tariff 12 Options: 26, 34, 142, 147, 169
1996	\$ 0.1100	Tariff 12 Options: 6, 34, 40, 54, 64, 68, 81, 92, 101, 126, 140, 147, 156, 169, 174
1997	\$ 0.1025	Tariff 12 Options: 22, 26, 33, 55, 57, 83, 97, 121, 132, 144, 153, 155, 163, 174, 185
1998	\$ 0.0975	Tariff 12 Options: 71, 81, 86, 101, 132, 156, 163, 169, 185
1999	\$ 0.0925	Tariff 12 Options: 86, 88, 112, 121, 123, 132, 136, 163, 164, 184
2000	\$ 0.0825	Tariff 12 Options: 4, 46, 64, 75, 92, 126, 151, 156, 157, 171, 175, 189

Table 5

Average Usage and Percent Change in Usage per Access Line per Day
1980 - 2000

Year	Local		Intrastate		Interstate	
	Average Usage (Dial Equipment Minutes per Local Loop)	Percentage Change in Usage 1980 Base Year	Average Usage (Dial Equipment Minutes per Local Loop)	Percentage Change in Usage 1980 Base Year	Average Usage (Dial Equipment Minutes per Local Loop)	Percentage Change in Usage 1980 Base Year
1980	39	0.0	4	0	4	0
1981	39	0.0	4	0	4	0
1982	39	0.0	4	0	4	0
1983	39	0.0	4	0	4	0
1984	40	2.6	5	25	5	25
1985	40	2.6	5	25	6	50
1986	39	0.0	5	25	6	50
1987	38	-2.6	6	50	7	75
1988	39	0.0	6	50	7	75
1989	38	-2.6	6	50	7	75
1990	37	-5.1	6	50	7	75
1991	37	-5.1	6	50	7	75
1992	37	-5.1	6	50	7	75
1993	37	-5.1	6	50	7	75
1994	38	-2.6	6	50	8	100
1995	38	-2.6	6	50	8	100
1996	40	2.6	6	50	8	100
1997	42	7.7	6	50	8	100
1998	44	7.7	6	50	8	100
1999 projected	46	7.7	6	50	8	100
2000 projected	48	7.7	6	50	8	100

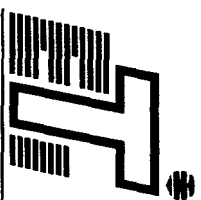
Source: FCC Report *Trends in Telephone Service*, September 1999, Table 12.2 - Line Usage Per Day Dial Equipment Minutes Per Local Loop.

Table 6			
How Far Could You Go for 70 Cents?			
Year	Length of Call (Minutes)	Mileage	Source
1980	5	22	NARUC, Long Distance Message Toll Telephone Rates, June 30, 1981, Table 50. The 1980 value was calculated based on the evening rate.
1990	5	124	AT&T Tariff FCC #1, 31st revised p. 56. The 1990 value was calculated based on the evening rate.
2000	10	Entire United States	Consumer Reports, <i>How to cut your phone bill</i> , February 2000, at 14. The article shows a 6.9 cent per minute rate as the most competitive long distance plan that has no additional monthly fee.

Table 7				
Local Service Prices and FCC Line Charges				
1983 - 2000				
Year	Unlimited Local calling plus taxes	Subscriber Line Charge (SLC)	PICC and USF	Total Monthly Charge
1983	11.58	0.00	0.00	11.58
1984	13.35	0.00	0.00	13.35
1985	13.53	1.01	0.00	14.54
1986	14.09	2.04	0.00	16.13
1987	14.00	2.66	0.00	16.66
1988	13.90	2.67	0.00	16.57
1989	14.00	3.53	0.00	17.53
1990	14.36	3.55	0.00	17.91
1991	15.15	3.56	0.00	18.71
1992	15.20	3.55	0.00	18.75
1993	15.46	3.55	0.00	19.01
1994	15.49	3.55	0.00	19.04
1995	16.03	3.54	0.00	19.57
1996	16.11	3.54	0.00	19.65
1997	16.10	3.53	0.00	19.63
1998	16.21	3.55	1.78	21.54
1999 projected	16.33	3.55	1.78	21.66
2000 projected	16.44	3.55	2.89	22.88
Sources:	FCC Report <i>Trends in Telephone Service</i> , September 1999, Table 14.1; FCC Report <i>Trends in Telephone Service</i> , September 1992, Table 6.		AT&T Tariff FCC #27, 2nd revised p. 24-555, 8th revised p. 24-555.	Calculated by adding local service charges plus FCC mandated charges.

Table 8				
Household Telephone Penetration and the Number of Residential Access Lines 1983 - 2000				
Year	Percentage of US Households with Telephones	Primary Residential Lines (Millions)	Additional Residential Lines (Millions)	Total Residential Lines (Millions)
1983	91.4	78.4	0.0	78.4
1984	91.6	79.3	0.0	79.3
1985	91.8	81.0	0.0	81.0
1986	92.2	82.5	0.0	82.5
1987	92.3	83.7	0.0	83.7
1988	92.8	85.4	2.3	87.7
1989	93.0	87.4	2.6	90.0
1990	93.3	88.4	3.9	92.3
1991	93.4	89.4	6.5	95.9
1992	93.8	91.0	8.3	99.3
1993	94.2	93.0	8.8	101.8
1994	93.8	93.7	11.4	105.1
1995	93.9	94.2	13.9	108.1
1996	93.9	95.1	15.7	110.8
1997	93.9	96.5	17.9	114.4
1998	94.1	97.4	20.4	117.8
1999 projected	94.3	98.0	23.3	121.3
2000 projected	94.5	98.4	26.5	124.9
Sources:	FCC Report <i>Trends in Telephone Service</i> , September 1999, Table 17.1.	FCC Report <i>Trends in Telephone Service</i> , September 1999, Table 20.4. Due to the lack of data for additional residential lines in the years 1983-1987, the values shown underestimate the actual number of additional residential lines and the total number of residential lines.		

Table 9			
The Real Price of Local Service 1983 - 2000			
Year	Monthly Residential Price of Local Service	CPI BASE YEAR 1982-84	Real Price
1983	11.58	99.6	11.58
1984	13.35	103.9	12.80
1985	14.54	107.6	13.46
1986	16.13	109.6	14.66
1987	16.66	113.6	14.61
1988	16.57	118.3	13.95
1989	17.53	124.0	14.08
1990	17.91	130.7	13.65
1991	18.71	136.2	13.68
1992	18.75	140.3	13.31
1993	19.01	144.5	13.10
1994	19.04	148.2	12.80
1995	19.57	152.4	12.79
1996	19.65	156.9	12.47
1997	19.63	160.5	12.18
1998	21.54	163.0	13.16
1999 <i>projected</i>	21.66	166.6	12.95
2000 <i>projected</i>	22.88	170.1	13.40
Notes	Calculated by adding local service charges plus FCC mandated charges. For sources of data, refer to Table 7.	Bureau of Labor Statistics Data, Consumer Price Index - All Urban Consumers, Not Seasonally Adjusted, Base Period 1982-84=100.	Calculated by multiplying price of local service times the CPI for base year over the CPI for each year.



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